THE GARMENT INDUSTRY: THE JOBS KEEP LEAVING

Introduction

The American Worker Project selected the apparel industry for its second case study because this industry was once among the largest manufacturing employers in the United States. Along with its sister industry, the textile industry, the manufacturing concerns involved in this business once employed in excess of 2.5 million workers.[1]

Background: Global Competition in the Apparel Industry

During the 1950s, the textile and garment industries began to face increased competition from abroad, as overseas manufacturers increased their imports into the United States and began to enlarge their share of the market. As a very powerful and diverse employer operating in many congressional districts, with key allies in Congress, these industries chose to face competition from abroad by turning to the political arena where they sought trade protections. These efforts met with success for many years.

At the same time these industries invested so much energy in efforts to secure trade protections, they witnessed steady job losses. For instance, between 1973 and 1992, employment in the domestic apparel industry fell from 1,400,200 to 985,300. In just a one-year period, between September 1997 and September 1998, employment in this industry fell by 68,000 jobs, resulting in an all time low total employment figure in the industry -- 754,000. This significant drop in the number of jobs was accompanied by a reduction in the number of firms. This is because the apparel industry had traditionally been an industry with many smaller firms in competition. For instance, in his August 6, 1998 testimony before the Subcommittee on Oversight and Investigations, former Secretary of Labor, John Dunlop observed that "in the misses and junior blouses and shirts industry, (Standard Industrial Code 2331) 78 percent of the establishments had less than 49 employees."[2] Obviously, the challenge of global competition is most difficult for these small firms, who do not possess the information and economic resources necessary to operate offshore and/or export their products to meet competition head-on.[3]

Increasing foreign competition has resulted in the apparel industry becoming more concentrated over the past two decades. The remaining firms are more trade dependent, reducing the demand for protectionist policies. With the growing division of opinion over protectionism, the role of the industries' trade associations, which once served as the proponents of protectionist policies, changed to one of neutrality.[4]

The full impact of this transition is seen in the recent announcement of the American Apparel Manufacturers Association that it will offer several new services to smaller member companies. One of these new services is assistance in providing information on fabric sourcing outside of the domestic market, so that these small companies can obtain competitively priced raw materials from around the world. Another new service will aid small companies in establishing plants offshore.[5]

Characteristics of the U.S. Apparel Industry

The garment industry operates in a complicated a system of competition where retailers receive apparel goods from manufacturers to sell to the public. Manufacturers traditionally design and cut material for the garments, but then contract for the assembly of a finished product (sewing and pressing). Thus, much of the labor-intensive activity, principally sewing, is conducted by the contractors who actually employ these workers.

Under this system of business, manufacturers who contract the sewing and pressing functions are termed "jobbers," since they pay others to actually perform the work and then have it returned as a finished product. As is generally the case in a competitive situation, the sewing contractors "bid" on the jobs, with the lowest bidding contractor receiving the work if it meets the criteria for the job.

The garment industry has become more complicated in recent years. For instance, the jobbers or manufacturers may not even cut the fabrics, choosing instead to contract for these services. Further, retailers are now performing the designing and coordinating function of manufacturers while manufacturers are selling directly to the public through their own retail operations. The distinction between the players has become increasingly blurred.

Other than issues of product quality and timeliness, most retailers or manufacturers see no reason to contract with domestic sewing or cutting contractors. Increasingly, these functions are spread throughout the world, further eroding the participation of small domestic firms and especially domestic workers.

The Garment Industry Proviso

The Landrum-Griffin Act of 1959 was passed to close loopholes in the 1947 Labor-Management Relations Act. One of the abuses was the secondary boycott, which Representative Robert Griffin explained this way: "The secondary boycott is an un-American device whereby one attacks an enemy by coercing or inflicting injury upon the friends or those who do business with the enemy. It is based upon the concept of 'guilt by association.' It is a method used by dictators to handle nonconformists by coercing their families and friends."[6]

Complex working relationships of the garment industry motivated Congress to provide a specific statutory exemption from the ban on secondary boycotts. This exemption is commonly referred to as the "Garment Industry Proviso." Congressional rationale for this exemption is best described in statements by Senators Jacob Javits, the Ranking Minority Member of the Senate Labor Committee, and Senator Barry Goldwater, a member of that Committee. Senator Javits stated: "firms are fiercely competitive (in this industry), constantly changing and difficult to organize…" He added that boycotts, as practiced by the garment industry unions, had "established relatively high wage and working standards" in the contracting sewing shops, and had "largely done away with sweatshop conditions in these trades." Senator Javits concluded, Congress should "avoid interfering with already established and legitimate labor practices" that work. Senator Goldwater added that, as someone involved in the retail industry all of his life, he

had seen what "happened in the garment sections of New York … Philadelphia, St. Louis, Chicago, and on the West Coast, and I have seen sweatshops disappear."[7]

Politicians on both sides of the aisle firmly believed that the use of secondary boycotts in the garment industry contributed to ending the sweatshops that had dominated the industry in the first half of the century. Before evaluating whether the Garment Industry Proviso has remained effective in eradicating sweatshops, it might be useful to assess use of the secondary boycott by organized labor in the garment industry.

Unions and the Secondary Boycott Privilege

In 1995, the International Ladies' Garment Workers' Union (ILGWU), made famous by its "look for the union label" commercials and the Amalgamated Clothing and Textile Workers Union (ACTWU), made famous by the movie "Norma Rae" merged to form the Union of Needletrades, Industrial and Textile Employees (UNITE). At the end of 1997, UNITE had 216, 261 members.[8]

UNITE's use of secondary boycotts has led to practices which have been questioned by many, perhaps the most controversial of which is the assessment of "liquidated damages". Due to its secondary boycott privilege, UNITE has been permitted to negotiate contracts with garment manufacturers requiring that all their production contracts go to union shops. The manufacturer must pay UNITE a financial penalty, "liquidated damages", if the manufacturer breaches the agreement by contracting any production with non-union shops.

On August 6, 1998, the Subcommittee on Oversight and Investigations, under the auspices of the American Worker Project, held a hearing on UNITE's collection of liquidated damages. Joel Cohen, a former attorney with the National Labor Relations Board for six years and subsequently an attorney for private sector clients in the apparel industry for fifteen years, accused UNITE of using liquidated damages not to discourage manufacturers from sending production orders overseas or to non-union shops in America, but to profit from its members' lost jobs. Mr. Cohen asserted that UNITE devised a scheme in which the union lowers financial penalties on manufacturers, making it economically beneficial for the manufacturer to send production orders to non-union shops and pay liquidated damages rather than to keep the jobs in union shops. Then, instead of passing along the liquidated damages to workers actually dislocated, UNITE puts the money in its general funds, allowing the union to spend the money in an unregulated fashion on whatever it deems necessary, Mr. Cohen said.[9]

The Subcommittee has found that UNITE and one of its predecessors, the ILGWU, have collected over $116 million dollars in liquidated damages since 1987. During the same years, its membership declined from 363,000 to 216,000.[10]

In one case, workers at Mademoiselle Knitwear Inc. in Brooklyn, NY sued UNITE for inadequately representing them. When Liz Claiborne, its principal customer, ended its relationship with Mademoiselle in 1995, 400 workers lost their jobs and 200 other workers had their hours reduced.[11] By April of 1998, only 175 workers remained.[12]

In May 1997 -- two months after a hearing to determine the penalty Claiborne would have to pay for violating its contract with Mademoiselle and the union workers employed there -- UNITE accepted a $750,000 settlement from Claiborne to go to the union members who withdrew their names from the lawsuit against Claiborne. The arbitration claim had been for $30 million. In an agreement that UNITE says is not linked to the settlement, the union accepted $13 million in liquidated damages, and $2.5 million in liquidated damages each year over the next three years under the assumption that Claiborne would continue to send work to non-union plants.[13]

Many of UNITE's members refused to accept the agreement saying their union had "sold them out." Only the settlement money would go to the workers, with the union free to spend the liquidated damages in any manner it deemed appropriate. Furthermore, the amount of liquidated damages paid since 1990 clearly showed that UNITE was demanding less liquidated damages than stipulated in its collective bargaining agreement with Liz Claiborne for sending work to non-union shops. As a result of capping liquidated damages at $2.5 million for the next three years, UNITE was accused of sending a signal to Liz Claiborne that it could send as much work overseas as it wanted without an increase in financial penalties. Incensed, the workers sued UNITE to put the $20.5 million in liquidated damages or $30 million value of lost Claiborne work in a trust fund for the benefit of workers. As of December 1998, the case was pending in the Federal District Court in Manhattan.[14]

In another case, manufacturer Leslie Fay, which was in bankruptcy, sought to move overseas. The firm proposed to spend any money it had left on retraining its employees to work in other industries. UNITE rejected the offer, and insisted on liquidated damages capped at $350,000 per year.

In his testimony before the Subcommittee on August 6, 1998, Jay Mazur, the president of UNITE, denied that his union was exploiting its power to assess liquidated damages. Mr. Mazur announced that a new Garment Workers' Assistance Fund would be established so that all funds would go toward benefits and social services for workers harmed by sweatshops at home and abroad. Under questioning, Mr. Mazur confirmed that the union's Garment Workers' Assistance Fund would not be jointly administered by the union and employers as is the practice for welfare, health, and pension benefits under Section 302 of the Taft-Hartley Act. He did say the fund would be established as a separate entity within the union and that a separate fund board, which includes non-union officials, but not employers, would administer the funds.[15]

Mr. Mazur also said liquidated damages discourage moving work from union factories to non-union shops. He said that UNITE and its predecessor unions had collected $168 million in liquidated damages over the last 27 years and had collected over $850 million in dues. During that same time, the union spent $170 million to organize and defend workers, $42 million to promote union jobs, unspecified millions on retirees, and unspecified millions on justice centers.

In addition to UNITE's use of liquidated damages under the Garment Industry Proviso, the union has also been criticized for abusing the Proviso to force employees to join the union against their will. On May 18, 1998, the Subcommittee on Oversight and Investigations held a hearing on this issue in Los Angeles, California.

During that hearing, the Subcommittee heard from Ms. Linda Klibanow who was representing 25 employees of Sorrento Coats in a court case against the Southwest District Council of UNITE. Their claim asserted that UNITE had denied these employees their right under Section 7 of the National Labor Relations Act (NLRA) to choose whether to belong to a union.[16]

Ms. Klibanow provided the Subcommittee with a summary of the workers' complaint. In 1990, UNITE became the exclusive bargaining representative of the Sorrento employees. Ms. Klibanow said UNITE used coercion and violence to obtain the authority to represent the employees. In the seven years following 1990, the terms and conditions of the Sorrento employees worsened with regard to wages, the availability of work, and eligibility for medical insurance. There were also inequities regarding whom the union required to pay dues.[17]

As a result, 42 of 52 Sorrento employees, including the union shop steward who had received little help from the union in improving working conditions, submitted handwritten petitions to their employer stating they no longer wished to be represented by UNITE. In apparent retaliation against the workers, UNITE coerced Sorrento's primary supplier to cease doing business with Sorrento in May 1997. Due to this action the workers lost their jobs and medical insurance benefits.[18]

UNITE also allegedly commenced a campaign of harassment against the Sorrento workers themselves, including repeated unscheduled nighttime visits to the homes of Sorrento employees telling them "the war had just begun." Ms. Klibanow said UNITE filed unfair practice charges against Sorrento. Under the law, whenever such charges are made, there can be no representation election. Ms. Klibanow alleges that UNITE filed the charges simply to block the conduct of an election on the employees' decertification petition. She said that the NLRB failed to process the Sorrento workers' petition, neglecting to investigate it or even to contact the workers filing it; however, the NLRB did proceed with UNITE's charges against Sorrento.[19]

Three workers from Sorrento Coats testified. A shop steward for UNITE, Tauni Simo, testified that UNITE won the right to represent workers in 1990 without an election. The other two workers, Maria Ramirez and Petra DeLeon, confirmed this testimony. All three workers said working conditions deteriorated at Sorrento after UNITE began representing them.[20]

In another allegation of abuse relating to UNITE's organizing, Mr. Sang Lee, former 5-year owner of Song of California Apparel Company, Inc. and Goodtime Fashions, testified that UNITE put him out of business. Mr. Lee began his testimony by apologizing for being unable to bring two former employees who were afraid to testify.[21]

Mr. Lee said he was forced to close his two businesses because he would not agree to allow UNITE to represent his employees without a vote. As a result, 278 Song of California Apparel employees and 158 Goodtime Fashions employees lost their jobs. Mr. Lee said when he refused to enter a collective bargaining agreement with UNITE and make his workers members of the union without their permission, UNITE used the Garment Industry Proviso's secondary boycott privilege to force manufacturers using his shops for production to stop doing business

with him. Mr. Lee said his employees were so opposed to joining the union that they picketed UNITE's offices in Los Angeles in August of 1995.[22]

In his testimony before the Subcommittee on August 6, Mr. Mazur adamantly defended UNITE's right to use secondary boycotts. Mr. Mazur said the Garment Industry Proviso is needed today because manufacturers control the wages and working conditions of workers in the contract shops that sew their products. Mr. Mazur said the Proviso allows his union to stipulate in agreements with manufacturers that work must go to union shops and the workers in those shops must receive benefits. Mr. Mazur said that last year UNITE collected $48 million from manufacturers to pay for health and pension benefits for about 40,000 union workers. Mr. Mazur said workers and their families would lose their benefits, their health care, their pensions, prescription drug plans, paid vacations, as well as holidays and other benefits if the Garment Industry Proviso were eliminated.[23]

The System-Wide Meltdown of Protections for Garment Workers

The General Accounting Office (GAO) defines a "sweatshop" as working conditions that violate more than one federal or state law governing: (1) the payment of a minimum wage; (2) overtime premium payments; (3) restrictions on certain types of homework; (4) the use of restricted child labor; (5) providing workers' compensation coverage; or (6) required industry registration and/or certain paperwork requirements. While many experts disagree on whether one violation constitutes a sweatshop, the violations listed above are commonly the laws broken by sweatshops. The Department of Labor, itself, does not subscribe to this definition or any definition of a sweatshop.

Subcommittee Chairman Pete Hoekstra visited New York City's Chinatown twice, on February 16 and March 18, 1998. On the latter visit, he was accompanied by the Chairman of the Committee on Education and the Workforce, Representative William Goodling. He discovered on these trips that sweatshops not only existed, but that they seemed to be thriving.

Chairman Hoekstra and Chairman Goodling visited the sweatshops and discussed the conditions there with the workers themselves and their advocates. A number of the people with whom they met testified before the Subcommittee on March 31, 1998. One of witnesses at the hearing, Peter Kwong, author of Forbidden Workers,[24] details in his book the characteristics of the workers in sweatshops in New York City's Chinatown.

According to Mr. Kwong, many of the workers allegedly came from China as part of "alien smuggling" rings. These Chinese workers are brought to America by gangsters known as "snakeheads." Once they arrive in America, the illegal male immigrants are given jobs such as working in the restaurant business, while women are given jobs in garment shops or prostitution, although they are unaware of this plan when they are brought to the U.S. The jobs allow the illegal immigrants to pay the snakeheads the $20,000 to $30,000 or more per person fee for bringing them to America. If the illegal immigrant does not pay the fee, enforcers and debt collectors use intimidation and violence. Debtors may be kidnapped and held in "safe houses" where they are beaten and tortured. In other cases, young children are taken and held for

ransom; teenage boys are severely beaten and teenage girls are raped or killed. Victims are sometimes forced to run drugs, collect debts, kidnap others, or resort to prostitution.[25]

The illegal Chinese immigrants are ideal victims for working in sweatshops. Many of them have sewing skills, are unable to speak English, have no other job opportunities due to language and cultural barriers, and can always be threatened with punishment by the snakeheads or with deportation by their employers if they seek better working conditions.

In his testimony before the Subcommittee, Mr. Kwong described the working conditions of many of these Chinese workers. Many garment workers, most of them women, make $3.50 an hour, working up to seventeen hour days without overtime pay. Many work in dilapidated buildings with inadequate ventilation; many don't receive their paychecks on time. When owners' debts pile up, they close shop and open another entity across the street. Workers who complain that they are owed back pay are often given excuses. If the workers persist, they are warned that they will be blacklisted and prevented from getting another job in Chinatown.[26]

Mr. Kwong said the contractors violate labor laws because they can get away with it. The performance of the Department of Labor is often ineffective, passive and slow. Mr. Kwong said the same about UNITE, and he added the union often has better relationships with the clothing shop owners than the workers. Mr. Kwong concluded by warning that the system-wide meltdown allowing workers to be exploited will encourage more illegal immigration as employers look for cheap laborers.

Six Chinese workers testified anonymously behind a screen about their experiences working in sweatshops. They all documented long work weeks, usually seven days a week; long work days, ranging from 10-to 24-hour days; deteriorating health due to working in abysmal conditions; and corrupt schemes such as being forced to buy their paychecks. [27]

John Fraser, the Acting Administrator of the Department of Labor's Wage and Hour Division, defended the Department's record at the March 31 hearing. Mr. Fraser said that there are approximately 20,000 contract shops employing some 800,000 workers to sew, assemble, iron, bag, and ship goods. The workers are mostly newly immigrated women who are only marginally connected to the economy.[28]

Mr. Fraser noted that the Wage and Hour Division only has 900 investigators who are responsible for enforcing compliance of 6.5 million businesses that employ 120 million people. In New York City there are 4,000 garment shops and only 40 investigators.

The Department realized their shop-by-shop approach to ending labor abuses was a failure, often causing shops to close down and then reopen again under a different name. In 1991, the Department tried a more systematic approach known as the "No-Sweat" garment strategy. Using "hot goods" provisions that make it illegal to ship in commerce goods produced in violation of the law, the Department pressured retailers and manufacturers to influence the compliance behavior of production shops. Another aspect of "No-Sweat" program was to educate manufacturers, retailers, consumers, and others on their obligations of compliance, and to give them tools to influence shop owners. The Department also formed partnerships not only

with manufacturers and retailers but also consumer groups and other interested parties to eradicate sweatshops. Other federal entities and schools that buy garments have also been contacted to exert influence on the garment industry.[29]

Mr. Fraser said another component of the "No-Sweat" strategy is to recognize retailers, manufacturers, and others for doing the right thing. In particular, the Department used a Trendsetter List to recognize companies that were taking responsible steps to encourage compliance.[30]

At the May 18 hearing in California, Julie Su, an attorney with Asian Pacific American Legal Center, defended UNITE and the Department of Labor. She stated that blaming them for the rise of sweatshops is akin to blaming the medicine for not curing the disease rather than going after the disease. Ms. Su said industry leaders such as manufacturers and retailers who choose to do what they can get away with, rather than what's right, are to blame for sweatshops.[31]

Ending the Sweatshop Dilemma: Will Voluntary Monitoring Programs Work?

The Subcommittee learned of several voluntary monitoring programs during the course of its hearings:

- At the May 18 hearing, Lonnie Kane, president of Karen Kane Inc. described the monitoring program run by the California Fashion Association. The program consists of outside monitoring services visiting garment shops on a programmed basis. Some visits are made with advanced notice and others on a surveillance basis. Data are compiled on whether the shops are meeting all state, federal, and OSHA requirements, and are then relayed to the manufacturer who contracts for the report. Mr. Kane said violations that still occur in shops are resolved quickly.

  Mr. Kane added that the California Fashion Association had aided the California Department of Labor in identifying unregistered shops operating in violation of labor laws. He stated that any increase in labor law violations in Southern California could be the result of success in finding underground garment shops.[32]

- At the same hearing, Mr. Richard Reinis described the formation of the Compliance Alliance, a not-for-profit corporation now comprised of 16 members that manufacture four million garments a month, accounting for $1.3 billion in wholesale value of goods. Members of the Compliance Alliance directly employ 2,800 people, and use as many as 400 independent contractors. The Compliance Alliance signed an agreement with then-Secretary of Labor Robert Reich to begin a voluntary monitoring program. Under the program, three independent monitoring companies are employed to inspect the shops of Compliance Alliance members for violations and remedy them if any are found.[33]

Mr. Reinis stated that the personnel used for inspecting the quality of products are also trained to look for labor law violations when Compliance Alliance monitors aren't there. Other facets of the Compliance Alliance monitoring program include: handing out educational materials to workers in their own languages; performing on-site investigations that include interviews with randomly selected employees in their own languages; and examining piece rate tickets, time cards and other pertinent time records.

Mr. Reinis cited statistics showing voluntary monitoring succeeds. A 1997 report by the Department of Labor showed that in Los Angeles violations in monitored shops were 60% less likely to occur than in non-monitored shops. Monitored shops were in compliance with minimum wage laws 73% of the time compared to 36% for non-monitored shops. A greater disparity existed for overtime violations.[34]

- At a hearing on September 25, 1998, the Subcommittee heard testimony from Larry Martin, President of the American Apparel Manufacturers Association (AAMA), the central trade association for U.S. companies that produce clothing. This association is responsible for about 85 percent of the $100 billion worth of clothing sold at wholesale in this country every year.

The Association believes it is the job of the industry to keep its own house in order, while it is the responsibility of the government to find and prosecute those who break the law. The Association has published a guide to labor laws along with guidelines for assessing compliance with those laws. These guides provide AAMA members with a means of checking the wage and hour performance and OSHA compliance of contractors. The organization also co-sponsored a series of compliance seminars with their members and the Department of Labor, and has supported increased penalties for willful violations of wage and hour laws.[35]

A number of AAMA members, dissatisfied with the scope and pace of existing initiatives, decided to take the lead in creating a comprehensive program to address workplace conditions in the United States and around the world. The AAMA created a task force to handle these problems and consulted retailers, trade associations, U.S. government agencies, international government organizations, and public interest groups to develop a set of minimum standards for apparel production that addresses labor practices, factory conditions, and environmental and customs compliance. The AAMA Board of Directors unanimously endorsed the resulting set of Responsible Apparel Production Principles.[36]

The voluntary Responsible Apparel Production Certification Program will include three critical elements. The first is clear and verifiable standards. The second is the evaluation of apparel production facilities by independent monitors. The monitoring and reporting procedures will provide detailed instructions to assess compliance with each item in the principles. The third element is oversight of the program by an independent entity representing diverse stakeholders. The AAMA expected this program to be fully operational by 1999.[37]

Findings and Recommendations

- Congress should perform aggressive oversight of the Department of Labor to ensure effective enforcement of laws intended to prevent sweatshops.

- Congress should evaluate Section 8(e) of Landrum-Griffin to determine whether the Garment Industry Proviso is effective in preventing sweatshops.

- Congress should follow-up on UNITE's commitment to use liquidated damages to establish a fund to directly assist workers.

- Congress should craft legislation that will lead to the eradication of sweatshops, and reconsider any current legislation that appears to be ineffective in preventing sweatshops.

- Congress should monitor the progress of the independent monitoring program now being established in the apparel industry, conducting hearings as appropriate. If the industry-sponsored monitoring programs prove successful, Congress should consider recognizing them in law.

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[1] U.S. Department of Labor, *Dynamic Change in the Garment Industry: How Firms and Workers Can Survive and Thrive*, 1996. www.dol.gov./dol/esa/public/forum/report.htm#overview.
[2] All hearings are summarized in Appendix 3. *John Dunlop, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (August 6, 1998).
[3] Id.
[4] Id.
[5] See, WOMENS WEAR DAILY, July 1, 1998.
[6] See Congressional Record -- House, August 11, 1959, p. 15531.
[7] See Congressional Record -- Senate, August 31, 1959, p. 17381.
[8] Obtained from UNITE's Form LM-2 for 1997, Labor Organization Annual Report which must be submitted by labor organizations with $200,000 or more in total annual receipts and labor organizations under trusteeship.
[9] *Joel Cohen, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (August 6, 1998).
[10] The $116 million in liquidated damages is the summation of liquidated damages paid to UNITE and its predecessor the ILGWU as listed on their LM-2 forms between 1987 and 1997. The number of members in 1987 is a combination of ILGWU and ACTWU members, which later formed UNITE, as reported by the AFL-CIO's *Report of the Executive Council*, annual. The 1997 number of UNITE members, as stated earlier is from UNITE's LM-2 form.
[11] Robert Fitch, *Sewing Suspicion*, VILLAGE VOICE, April 7, 1998.
[12] Diana B. Henriques, *Bitter Dispute Pits Garment Union Against Its Workers*, NEW YORK TIMES, Front Page, April 27, 1998.
[13] Robert Fitch, *Sewing Suspicion*, VILLAGE VOICE, April 7, 1998.
[14]. Diana B. Henriques, *Bitter Dispute Pits Garment Union Against Its Workers*, NEW YORK TIMES, Front Page, April 27, 1998.
[15] *Jay Mazur, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (August 6, 1998).
[16]*Linda Klibanow, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (May 18, 1998).
[17] Id.

[18] Id.
[19] Id.
[20] T*aumi Simo, Maria Ramirez, and Petra DeLeon, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations,* 105th Cong., 2nd Sess. (May 18, 1998).
[21] *Sang Lee, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (May 18, 1998).
[22] Id.
[23] Robert Misseck, *Labor Issue Spurs Boycott of Ohio Uniform Company*, THE STAR-LEDGER, September 1, 1998.
[24] *Jay Mazur, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (August 6, 1998).
[25] Peter Kwong, FORBIDDEN WORKERS (New Press 1997).
[26] Id.
[27] *Peter Kwong, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (March 31, 1998).
[28] See testimony of six anonymous workers, *testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations,* 105th Cong., 2nd Sess. (March 31, 1998).*John Fraser, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (March 31, 1998).
[29] *John Fraser, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations*, 105th Cong., 2nd Sess. (March 31, 1998).
[30] Id.
[31] Id.
[32] *Julie Su, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations, 105th Cong., 2nd Sess*. (May 18, 1998).
[33] Id.
[34] Richard Reinis, *testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations, 105th Cong., 2nd Sess*. (May 18, 1998).
[35] Id.
[36] Larry Martin, testimony before the House of Representatives, Committee on Education and the Workforce's Subcommittee on Oversight and Investigations, 105th Cong., 2nd Sess. (September 25, 1998).
[37] Id.